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PLAINTIFF WORDTECH SYSTEMS, INC.

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

WORDTECH SYSTEMS, INC., a	)	Case No.: CIV.S-04-1971 MCE PAN
California corporation,	)	
	)	FIRST AMENDED COMPLAINT FOR
Plaintiff,	)	PATENT INFRINGEMENT, INJUNCTIVE
	)	RELIEF, AND DAMAGES
vs.	)	
	)	<b>DEMAND FOR JURY TRIAL</b>
INTEGRATED NETWORK SOLUTIONS,	)	
INC., a Nevada corporation, dba	)	
INTEGRATED NETWORK SOLUTIONS,	)	
CORP. aka INTEGRATED NETWORK	)	
SOLUTIONS aka INTEGRATED	)	
SYSTEMS aka INTERNET NETWORK	)	
STORAGE COMPANY aka INSC;	)	
NASSER KHATEMI, an individual;	)	
HAMID ASSADIAN, an individual;	)	
EHTERAM GHODSIAN, an	)	
individual; SHOHREH JAVADI, an	)	
individual; MICHAEL F.	)	
ELLSWORTH, an individual; BRIAN	)	
J. DEAN, an individual; SAN	)	
JUAN UNIFIED SCHOOL DISTRICT;	)	
and DOES 1-50,	)	
	)	
Defendants.	)	

1 Plaintiff, WORDTECH SYSTEMS, INC., a California corporation,  
2 alleges as follows:

3 **THE PARTIES**

4 1. Plaintiff, WordTech Systems, Inc. ("WordTech"), is a  
5 corporation organized under the laws of the State of California  
6 with its principal place of business located in Concord,  
7 California.

8 2. On information and belief, defendant INTEGRATED  
9 NETWORK SOLUTIONS, INC., is a Nevada corporation doing business  
10 in California as INTEGRATED NETWORK SOLUTIONS, CORP. aka  
11 INTEGRATED NETWORK SYSTEMS aka INTEGRATED SYSTEMS aka INTERNET  
12 NETWORK STORAGE COMPANY aka INTERNET NETWORK STORAGE COMPANY aka  
13 INSC (hereinafter referred to as "INSC"), with its principal  
14 place of business located at 199 Technology Drive, Suite 140,  
15 Irvine, California.

16 3. On information and belief, defendant NASSER KHATEMI is  
17 and at all relevant times was the president and owner of INSC.

18 4. On information and belief, defendant HAMID ASSADIAN is  
19 and at all relevant times was an owner, officer, director,  
20 and/or employee of INSC.

21 5. On information and belief, EHTERAM GHODSIAN is and at  
22 all relevant times was an owner, officer, and/or director of  
23 INSC.

24 6. On information and belief, SHOHREH JAVADI is and at  
25 all relevant times was an owner, officer, and/or director INSC.

1           7. On information and belief, defendant MICHAEL F.  
2 ELLSWORTH, whose address is 5823 Woodbrook Court, Sacramento,  
3 California, 95841, is and at all relevant times was an owner,  
4 officer, and/or director of Integrated Network Solutions, Inc.,  
5 a Nevada corporation.

6           8. On information and belief, BRIAN J. DEAN, whose  
7 address is 1665 Broadmere Street, Las Vegas, Nevada, is and at  
8 all relevant times was an owner, officer, and/or director of  
9 Integrated Network Solutions, Inc., a Nevada corporation.

10          9. Defendants INSC, NASSER KHATEMI, HAMID ASSADIAN,  
11 EHTERAM GHODSIAN, SHOHREH JAVADI, MICHAEL F. ELLSWORTH, and  
12 BRIAN J. DEAN, will hereinafter collectively be referred to as  
13 "INSC PERSONELL."

14          10. On information and belief, SAN JUAN UNIFIED SCHOOL  
15 DISTRICT (hereinafter referred to as "SCHOOL DISTRICT") is and  
16 at all relevant times herein mentioned was, a school district  
17 duly organized and existing under the laws of the State of  
18 California, and is located in the Eastern District of California  
19 at 3738 Walnut Avenue, Carmichael, California 95608.

20          11. Plaintiff is ignorant of the true names and capacities  
21 of defendants sued herein as Does 1-50, inclusive, and therefore  
22 sues these defendants by these fictitious names. Plaintiff will  
23 amend this complaint to allege their true names and capacities  
24 when ascertained. Plaintiff is informed and believes and thereon  
25 alleges that each of the fictitiously named defendants is

1 responsible in some manner for the occurrences herein alleged,  
2 and that plaintiff's injuries as herein alleged were proximately  
3 caused by the wrongful conduct of these fictitiously named  
4 defendants.

5 12. Plaintiff is informed and believes and thereon alleges  
6 that at all times herein mentioned, Does 1-50 were the agents,  
7 servants, and employees of their codefendants and in doing the  
8 things hereinafter alleged were acting within the course and  
9 scope of their authority as agents, servants, and employees with  
10 the permission and consent of their codefendants.

11 **JURISDICTION AND VENUE**

12 13. This action arises under the patent laws of the United  
13 States, 35 U.S.C. §§ 271, 281, and 283-285.

14 14. Subject matter jurisdiction is conferred on this Court  
15 by 28 U.S.C. §§ 1331 and 1338(a).

16 15. Venue lies properly in this Court under 28 U.S.C. §§  
17 1391(b), 1391(c), 1391(d) and/or 1400(b).

18 **BACKGROUND**

19 16. On October 31, 2000, the U.S. Patent Office issued  
20 U.S. Patent No. 6,141,298, entitled Programmable Self-Operating  
21 Compact Disk Duplication System, listing David Miller as the  
22 inventor ("Patent 298"). A true and correct copy of Patent 298  
23 is attached hereto as **Exhibit A**.

1           17. On September 14, 1998, David Miller assigned his  
2 rights to Patent 298 to WordTech. A true and correct copy of  
3 the recorded Assignment is attached hereto as **Exhibit B.**

4           18. On March 11, 2003, the U.S. Patent Office issued a  
5 patent, U.S. Patent No. 6,532,198 entitled Programmable Self-  
6 Operating Compact Disk Duplication System, which is a division  
7 of Patent 298, listing WordTech as the assignee ("Patent 198").  
8 A true and correct copy of Patent 198 is attached hereto as  
9 **Exhibit C.**

10           19. On November 23, 2004, the U.S. Patent Office issued a  
11 patent, U.S. Patent No. 6,822,932 entitled Programmable Self-  
12 Operating Compact Disk Duplication System, which is a division  
13 of Patent 298, with WordTech as the assignee ("Patent 932"). A  
14 true and correct copy of Patent 932 is attached hereto as  
15 **Exhibit D.**

16           20. WordTech is the assignee and exclusive owner of all  
17 rights, title and interest in Patent 298 and Patent 198 and  
18 Patent 932 and has the right to bring this suit for damages and  
19 injunctive relief.

20                           **GENERAL ALLEGATIONS**

21           21. WordTech is owner by assignment of all right, title  
22 and interest in Patent 298.

23           22. WordTech is owner by assignment of all right, title  
24 and interest in Patent 198.

1           23. WordTech is owner by assignment of all right, title  
2 and interest in Patent 932.

3           24. Patent 298 relates to a Programmable Self-Operating  
4 Compact Disk Duplication System, including, *inter alia*, the  
5 controller, whether singlecard or a motherboard configuration,  
6 software, drives, robotics, printers, accessories, housing or  
7 any other component to operate the disk duplicator and was duly  
8 issued to David Miller on October 31, 2000, and assigned to  
9 WordTech on September 14, 1998.

10          25. Patent 198 is division of Patent 298 and also relates  
11 to a disk duplication system for the duplication of binary data  
12 onto CD-R disks, the system including a copy unit, a host  
13 computer and computer software, the software being installed in  
14 the host computer to provide a user interface and to direct the  
15 transfer of data from the host computer to the copy unit, the  
16 copy unit including a set of multiple stacked recordable disk  
17 drives, and a microprocessor electronically connected to the  
18 activation system of a pivotal transport tower and to the set of  
19 multiple stacked recordable disk drives.

20          26. Patent 932 is division of Patent 198 and also relates  
21 to a disk duplication system for the duplication of binary data  
22 onto CD-R disks, the system including a copy unit, a host  
23 computer and computer software, the software being installed in  
24 the host computer to provide a user interface and to direct the  
25 transfer of data from the host computer to the copy unit, the

1 copy unit including a set of multiple stacked recordable disk  
2 drives, and a microprocessor electronically connected to the  
3 activation system of a pivotal transport tower and to the set of  
4 multiple stacked recordable disk drives.

5 27. On information and belief, INSC and INSC PERSONNEL  
6 have engaged in providing users with programmable self-operating  
7 compact disk duplication systems which are covered by Patent 298  
8 and Patent 198 and Patent 932. More specifically, INSC and INSC  
9 PERSONNEL make, manufacturer, assemble, use, sell, resell, offer  
10 for sale, import or otherwise transfer to third parties in the  
11 Eastern District of the United States of America disk  
12 duplication systems which directly and contributorily infringe  
13 upon the technology covered by Patent 298 and Patent 198 and  
14 Patent 932 and also induce third parties to infringe upon the  
15 technology covered by Patent 298 and Patent 198 and Patent 932  
16 by selling infringing products to them.

17 28. On information and belief, defendant SCHOOL DISTRICT  
18 has purchased and is using unlicensed programmable self-  
19 operating compact disk duplication systems in the Eastern  
20 District of California which were sold by INSC and INSC  
21 PERSONNEL and which are covered by Patent 298 and Patent 198 and  
22 Patent 932 and are thereby infringing said patents.

23 29. Upon information and belief, defendants INSC and INSC  
24 PERSONNEL have engaged in the manufacture, use, distribution,  
25 and the sale of disc duplication systems embodying the

1 inventions of the technology covered by Patent 298 and Patent  
2 198 and Patent 932 in this judicial district and throughout the  
3 United States.

4 30. Upon information and belief, defendant SCHOOL DISTRICT  
5 has purchased and uses disc duplication systems embodying the  
6 inventions of the technology covered by Patent 298 and Patent  
7 198 and Patent 932 in this judicial district and throughout the  
8 United States.

9 31. Plaintiff has placed the required statutory notice on  
10 all of its products manufactured and sold by it.

11 32. Upon information and belief, defendants, and each of  
12 them, have ongoing and systematic contacts with this judicial  
13 district and the United States. Defendants INSC and INSC  
14 PERSONNEL have placed and attempted to place disc duplication  
15 systems infringing technology covered by Patent 298 and Patent  
16 198 and Patent 932 in the stream of commerce, knowing and  
17 expecting that such products would end up in this Judicial  
18 District. Defendants INSC and INSC PERSONNEL have also provided  
19 services covered by the claims of Patent 298 and Patent 198 and  
20 Patent 932 to consumers in this Judicial District.

21 **PATENT INFRINGEMENT OF U.S. PATENT NO. 6,141,298**

22 33. Plaintiff hereby incorporates paragraphs 1-32 above,  
23 inclusive, by this reference.

24 34. Defendants have manufactured, made, assembled, used,  
25 sold, resold, imported, offered to sell or otherwise transferred



1 to third parties and will continue to manufacture, make,  
2 assemble, use, sell, resell, import, offer to sell or otherwise  
3 transfer programmable self-operating compact disc duplication  
4 systems that include each element of and infringe upon one or  
5 more claims of the 298 patent, without a license from WordTech.

6 35. By making, assembling, manufacturing, using, selling,  
7 reselling, importing or otherwise transferring and/or offering  
8 for sale programmable self-operating compact disc duplication  
9 systems, defendants have directly and contributorily infringed  
10 and will continue to directly and contributorily infringed on  
11 one more of the claims of Patent 298 under 35 U.S.C. § 271 (a),  
12 (b), (c) and/or (f) literally and/or under the doctrine of  
13 equivalents.

14 36. On December 29, 2000, David Miller sent a letter to  
15 INSC informing of WordTech's patent, providing a copy of Patent  
16 298 and offering a license. A true and correct copy of the  
17 unsigned letter from David Miller to ISNC dated December 29,  
18 2000, is attached hereto as **Exhibit E**.

19 37. On February 26, 2002, David Miller sent an email to  
20 INSC confirming that he had spoken with INSC in 2000 about the  
21 patent and a license and again providing a copy of Patent 298 as  
22 well as a copy of a recent press release. A true and correct  
23 copy of the email from David Miller to Hamid Assadian of INSC  
24 dated February 26, 2002, is attached hereto as **Exhibit F**.

1           38. On July 29, 2002, David Miller sent an email to Hamid  
2 Assadian of INSC regarding their prior conversations and  
3 referencing Patent 298. A true and correct copy of the email  
4 dated July 29, 2002 to Hamid Assadian of INSC is attached hereto  
5 as **Exhibit G**.

6           39. On July 31, 2002, David Miller sent another email to  
7 Hamid Assadian of INSC concerning resolving the patent  
8 infringement issues. A true and correct copy of the email dated  
9 July 29, 2002 to Hamid Assadian of INSC is attached hereto as  
10 **Exhibit H**.

11           40. On August 5, 2002, David Miller sent another email to  
12 Hamid Assadian of INSC referencing the patent issue and  
13 attaching a non-disclosure agreement. A true and correct copy  
14 of the email dated August 5, 2002 to Hamid Assadian of INSC is  
15 attached hereto as **Exhibit I**.

16           41. November 15, 2002, counsel for WordTech informed INSC  
17 that a license was needed under Patent 298 and provided INSC  
18 with a copy of Patent 298. A true and correct copy of the  
19 unsigned version of the letter from Janine Ogando to INSC is  
20 attached hereto as **Exhibit J**.

21           42. On information and belief, the infringement by  
22 defendants on Patent 298 has been and continues to be willful  
23 and deliberate.

24           43. Unless enjoined by the Court, defendants will continue  
25 to infringe Wordtech's patents.

1           44. Plaintiff has placed the required statutory notice on  
2 all of its products manufactured and sold by it.

3           45. As a direct and proximate consequence of the acts and  
4 practices of defendants, plaintiff WordTech has been, is being,  
5 and continues to suffer irreparable injury and be damaged for  
6 which it has no adequate remedy at law; unless such acts and  
7 practices of defendants are enjoined by the Court, plaintiff  
8 will continue to be injured in its business and property rights  
9 and has suffered and is suffering and will continue to suffer  
10 injury and damages for which it is entitled to relief under 35  
11 U.S.C. § 284.

12           **PATENT INFRINGEMENT OF U.S. PATENT NO. 6,532,198**

13           46. Plaintiff hereby incorporates paragraphs 1-45 above,  
14 inclusive, by this reference.

15           47. Defendants have manufactured, made, assembled, used,  
16 sold, resold, imported, offered to sell or otherwise transferred  
17 to third parties and will continue to manufacture, make,  
18 assemble, use, sell, resell, import, offer to sell or otherwise  
19 transfer programmable self-operating compact disc duplication  
20 systems that include each element of and infringe upon one or  
21 more claims of the 198 patent, without a license from WordTech.

22           48. By making, assembling, manufacturing, using, selling,  
23 reselling, importing or otherwise transferring and/or offering  
24 for sale programmable self-operating compact disc duplication  
25 systems, defendants have directly and contributorily infringed

1 and will continue to directly and contributorily infringe on one  
2 more of the claims of Patent 198 under 35 U.S.C. § 271 (a), (b),  
3 (c) and/or (f) literally and/or under the doctrine of  
4 equivalents.

5 49. On March 25, 2003, WordTech formally informed INSC of  
6 Patent 198, offered it a license, and provided a copy of Patent  
7 198. A true and correct copy of the letter from Janine C.  
8 Ogando to INSC is attached hereto as **Exhibit K**.

9 50. On information and belief, the infringement by  
10 defendants upon Patent 198 has been and continues to be willful  
11 and deliberate.

12 51. Unless enjoined by the Court, defendants will continue  
13 to infringe Wordtech's patents.

14 52. Plaintiff has placed the required statutory notice on  
15 all of its products manufactured and sold by it.

16 53. As a direct and proximate consequence of the acts and  
17 practices of defendants, plaintiff WordTech has been, is being,  
18 and continues to suffer irreparable injury and be damaged for  
19 which it has no adequate remedy at law; unless such acts and  
20 practices of defendants are enjoined by the Court, plaintiff  
21 will continue to be injured in its business and property rights  
22 and has suffered and is suffering and will continue to suffer  
23 injury and damages for which it is entitled to relief under 35  
24 U.S.C. § 284.

**PATENT INFRINGEMENT OF U.S. PATENT NO. 6,822,932**

54. Plaintiff hereby incorporates paragraphs 53 above, inclusive, by this reference.

55. Defendants have manufactured, made, assembled, used, sold, resold, imported, offered to sell or otherwise transferred to third parties and will continue to manufacture, make, assemble, use, sell, resell, import, offer to sell or otherwise transfer programmable self-operating compact disc duplication systems that include each element of and infringe upon one or more claims of the 932 patent, without a license from WordTech.

56. By making, assembling, manufacturing, using, selling, reselling, importing or otherwise transferring and/or offering for sale programmable self-operating compact disc duplication systems, defendants have directly and contributorily infringed and will continue to directly and contributorily infringe on one more of the claims of Patent 198 under 35 U.S.C. § 271 (a), (b), (c) and/or (f) literally and/or under the doctrine of equivalents.

57. On January 21, 2005, WordTech formally informed INSC of Patent 932, offered it a license, and provided a copy of Patent 932. A true and correct copy of the letter from David Miller to INSC is attached hereto as **Exhibit L**.

58. On information and belief, the infringement by defendants upon Patent 932 has been and continues to be willful and deliberate.

1           59. Unless enjoined by the Court, defendants will continue  
2 to infringe Wordtech's patents.

3           60. Plaintiff has placed the required statutory notice on  
4 all of its products manufactured and sold by it.

5           61. As a direct and proximate consequence of the acts and  
6 practices of defendants, plaintiff WordTech has been, is being,  
7 and continues to suffer irreparable injury and be damaged for  
8 which it has no adequate remedy at law; unless such acts and  
9 practices of defendants are enjoined by the Court, plaintiff  
10 will continue to be injured in its business and property rights  
11 and has suffered and is suffering and will continue to suffer  
12 injury and damages for which it is entitled to relief under 35  
13 U.S.C. § 284.

14                           **PRAYER FOR RELIEF**

15 WHEREFORE, plaintiff prays for the entry of a judgment from this  
16 Court:

- 17       a. Declaring that United States Patent No. 6,141,298 was duly  
18       and legally issued, and is valid and enforceable;  
19       b. Declaring that United States Patent No. 6,532,198 was duly  
20       and legally issued, and is valid and enforceable;  
21       c. Declaring that United States Patent No. 6,822,932 was duly  
22       and legally issued, and is valid and enforceable;  
23       d. Declaring that defendant INSC has directly infringed,  
24       contributorily infringed, and or induced infringement of  
25       one or more claims of the Patent 298;

- e. Declaring that defendant NASSER KHATEMI has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- f. Declaring that defendant HAMID ASSADIAN has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- g. Declaring that defendant EHTERAM GHODSIAN has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- h. Declaring that defendant MICHAEL F. ELLSWORTH has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- i. Declaring that defendant BRIAN J. DEAN has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- j. Declaring that defendant SHOHREH JAVADI has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- k. Declaring that defendant SCHOOL DISTRICT has directly infringed, contributorily infringed, and or induced infringement of one or more claims of the Patent 298;
- l. Declaring that defendant INSC has directly infringed, contributorily infringed, and or induced infringement of one or more claims of Patent 198;

- 1 m. Declaring that defendant NASSER KHATEMI has directly  
2 infringed, contributorily infringed, and or induced  
3 infringement of one or more claims of Patent 198;
- 4 n. Declaring that defendant HAMID ASSADIAN has directly  
5 infringed, contributorily infringed, and or induced  
6 infringement of one or more claims of Patent 198;
- 7 o. Declaring that defendant EHTERAM GHODSIAN has directly  
8 infringed, contributorily infringed, and or induced  
9 infringement of one or more claims of the Patent 198;
- 10 p. Declaring that defendant MICHAEL F. ELLSWORTH has directly  
11 infringed, contributorily infringed, and or induced  
12 infringement of one or more claims of the Patent 198;
- 13 q. Declaring that defendant BRIAN J. DEAN has directly  
14 infringed, contributorily infringed, and or induced  
15 infringement of one or more claims of the Patent 198;
- 16 r. Declaring that defendant SHOHREH JAVADI has directly  
17 infringed, contributorily infringed, and or induced  
18 infringement of one or more claims of the Patent 198;
- 19 s. Declaring that defendant SCHOOL DISTRICT has directly  
20 infringed, contributorily infringed, and or induced  
21 infringement of one or more claims of the Patent 198;
- 22 t. Declaring that defendant INSC has directly infringed,  
23 contributorily infringed, and or induced infringement of  
24 one or more claims of the Patent 932;
- 25



- 1 u. Declaring that defendant NASSER KHATEMI has directly
- 2 infringed, contributorily infringed, and or induced
- 3 infringement of one or more claims of the Patent 932;
- 4 v. Declaring that defendant HAMID ASSADIAN has directly
- 5 infringed, contributorily infringed, and or induced
- 6 infringement of one or more claims of the Patent 932;
- 7 w. Declaring that defendant EHTERAM GHODSIAN has directly
- 8 infringed, contributorily infringed, and or induced
- 9 infringement of one or more claims of the Patent 932;
- 10 x. Declaring that defendant MICHAEL F. ELLSWORTH has directly
- 11 infringed, contributorily infringed, and or induced
- 12 infringement of one or more claims of the Patent 932;
- 13 y. Declaring that defendant BRIAN J. DEAN has directly
- 14 infringed, contributorily infringed, and or induced
- 15 infringement of one or more claims of the Patent 932;
- 16 z. Declaring that defendant SHOHREH JAVADI has directly
- 17 infringed, contributorily infringed, and or induced
- 18 infringement of one or more claims of the Patent 932;
- 19 aa. Declaring that defendant SCHOOL DISTRICT has directly
- 20 infringed, contributorily infringed, and or induced
- 21 infringement of one or more claims of the Patent 932;
- 22 bb. Declaring that defendant INSC has willfully infringed one
- 23 or more claims of the Patent 298;
- 24 cc. Declaring that defendant NASSER KHATEMI has willfully
- 25 infringed one or more claims of the Patent 298;

1 dd.Declaring that defendant HAMID ASSADIAN has willfully  
2 infringed one or more claims of the Patent 298;

3 ee.Declaring that defendant EHTERAM GHODSIAN has willfully  
4 infringed one or more claims of the Patent 298;

5 ff.Declaring that defendant MICHAEL F. ELLSWORTH has willfully  
6 infringed one or more claims of the Patent 298;

7 gg.Declaring that defendant BRIAN J. DEAN has willfully  
8 infringed one or more claims of the Patent 298;

9 hh.Declaring that defendant SHOHREH JAVADI has willfully  
10 infringed one or more claims of the Patent 298;

11 ii.Declaring that defendant SCHOOL DISTRICT has willfully  
12 infringed one or more claims of the Patent 298;

13 jj.Declaring that defendant INSC has willfully infringed one  
14 or more claims of Patent 198;

15 kk.Declaring that defendant NASSER KHATEMI has willfully  
16 infringed one or more claims of Patent 198;

17 ll.Declaring that defendant HAMID ASSADIAN has willfully  
18 infringed one or more claims of Patent 198;

19 mm.Declaring that defendant EHTERAM GHODSIAN has willfully  
20 infringed one or more claims of Patent 198;

21 nn.Declaring that defendant MICHAEL F. ELLSWORTH has willfully  
22 infringed one or more claims of Patent 198;

23 oo.Declaring that defendant BRIAN J. DEAN has willfully  
24 infringed one or more claims of Patent 198;

1 pp.Declaring that defendant SHOHREH JAVADI has willfully  
2 infringed one or more claims of Patent 198;

3 qq.Declaring that defendant SCHOOL DISTRICT has willfully  
4 infringed one or more claims of the Patent 198;

5 rr.Declaring that defendant INSC has willfully infringed one  
6 or more claims of the Patent 932;

7 ss.Declaring that defendant NASSER KHATEMI has willfully  
8 infringed one or more claims of the Patent 932;

9 tt.Declaring that defendant HAMID ASSADIAN has willfully  
10 infringed one or more claims of the Patent 932;

11 uu.Declaring that defendant EHTERAM GHODSIAN has willfully  
12 infringed one or more claims of the Patent 932;

13 vv.Declaring that defendant MICHAEL F. ELLSWORTH has willfully  
14 infringed one or more claims of the Patent 932;

15 ww.Declaring that defendant BRIAN J. DEAN has willfully  
16 infringed one or more claims of the Patent 932;

17 xx.Declaring that defendant SHOHREH JAVADI has willfully  
18 infringed one or more claims of the Patent 932;

19 yy.Declaring that defendant SCHOOL DISTRICT has willfully  
20 infringed one or more claims of the Patent 932;

21 zz.Deeming this to be an exceptional case within the meaning  
22 of 35 U.S.C. § 285, entitling plaintiff WordTech to an  
23 award of its reasonable attorneys' fees expense and costs  
24 in this action;  
25

1       aaa.     Preliminarily and permanently enjoining defendant INSC  
2       and its respective officers, agents, servants, employees,  
3       attorneys, INSC PESONNEL, SCHOOL DISTRICT and those persons  
4       in active concert or participation with them who receive  
5       notice of the order by personal service or otherwise, from  
6       committing further acts of infringement under 35 U.S.C. §  
7       271 of one or more claims of Patent 298 pursuant to 35  
8       U.S.C. § 283;

9       bbb.     Preliminarily and permanently enjoining defendant INSC  
10      and its respective officers, agents, servants, employees,  
11      attorneys, INSC PESONNEL, SCHOOL DISTRICT and those persons  
12      in active concert or participation with them who receive  
13      notice of the order by personal service or otherwise, from  
14      committing further acts of infringement under 35 U.S.C. §  
15      271 of one or more claims of Patent 198 pursuant to 35  
16      U.S.C. § 283;

17      ccc.     Preliminarily and permanently enjoining defendant INSC  
18      and its respective officers, agents, servants, employees,  
19      attorneys, INSC PESONNEL, SCHOOL DISTRICT and those persons  
20      in active concert or participation with them who receive  
21      notice of the order by personal service or otherwise, from  
22      committing further acts of infringement under 35 U.S.C. §  
23      271 of one or more claims of Patent 932 pursuant to 35  
24      U.S.C. § 283;

ddd. Awarding plaintiff damages in accordance with 35  
U.S.C. § 284;

eee. Awarding plaintiff its costs in connection with this  
action;

fff. Awarding plaintiff exemplary damages and attorneys'  
fees and costs as a result of willful and deliberate  
infringement on Patent 298.

ggg. Awarding plaintiff exemplary damages and attorneys'  
fees and costs as a result of willful and deliberate  
infringement on Patent 198.

hhh. Awarding plaintiff exemplary damages and attorneys'  
fees and costs as a result of willful and deliberate  
infringement on Patent 932.

iii. Awarding plaintiff such other and further relief as  
this Court may deem to be just and proper.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury trial pursuant to Rule 38 of the  
Federal Rules of Civil Procedure as to all issues in this  
lawsuit.

Dated: January 28, 2005

BY: /s/ Janine C. Ogando  
Janine C. Ogando  
Attorneys for Plaintiff  
WORDTECH SYSTEMS, INC.